

## Mackay Envelope Corporation

AUG 26 1991 IOWA SECTION

Iowa Division

August 23, 1991

Mr. Michael Sanderson Chief, RCRA Branch U. S. E. P. A., Region VII 726 Minnesota Avenue Kansas City, Kansas 66101

Dear Sir:

Please consider this list of corrective actions taken or yet to be completed as satisfying the attached sheet of alleged violations:

- 1. We have made a determination that solvent soaked shop rags and paper towels are not hazardous, since the solvents dry out and the residual is non-hazardous according to our MSDS sheets. Spent filter media from litho press fountains are not hazardous since they are squeezed out, leaving only paper dust and captured airborne particulates. Used oil filters are being sent to our city oil waste collection point for disposal per their instructions. Shop rags are being sent out for cleaning, with the assurances that the ink, grease, oil, etc. residual is being disposed of properly.
- 2, 3 & 4. The EPA inspectors cited us for not dating drums, not labelling drums and not closing waste drums. The labels had been ordered the previous day along with a truck to haul the "hazardous waste". On that day, the ink had been in 5-gallon containers which had been on our premises for several years and had gone bad. I decided to pour it into the shipping drums before I received my labels. The ink has since been hauled away (see attached manifest copy).
- 5. Failure to have a hazardous waste management training program. This program is being developed and will be small scale since one person will be in charge of the small amount of flammable waste we now generate. It will be ready October 1, 1991.



0	INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF SOLID AND HAZARDOUS VICTE MANAGEMENT	Hir
1 A	P.O. Box 7035	
	Indianapolis, IN 46207-7035	

P.C. Box 617  Mt. Pleasant, IA 52641 Generator's Phone (319) 385-9061  5. Transporter   Company Name   Clean Harbors of Kingston, Inc.   M. A. D.O. 3, 9, 3, 2, 2, 2, 5, 5, 5, 5, 5, 5, 5, 5, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7,	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA II		Manifest Document No.	2. Pag			ie shaded areas Federal law, I d I are required
Example to Company Name Clean Harbors of Kingston, Inc. N. A. D. O. 3.9.3.2.2.2.5.0  Transporter 2 Company Name C. Use EPA ID Number C. Transporter 2 Company Name C. Use EPA ID Number C. Transporter 2 Company Name C. Use EPA ID Number C. State Transporter 9 Inc. C. State Transporte	Mt. Pleasant, IA 52641	Let 25 be a few compact	tanen eri ir. Heresi irai	e de la companya de l	INA	039	371	71
Printed Process and Additional International and national government regulations.  J. Beneficial Containers and Site Address  10. Use EPA ID Number  13. The Dot O. 6. 4. 6. 9. 4. 3 219-397-3951  1. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)  No. Type  Quantity  No. Type  Quantity  Additional Descriptions for Materials Listed Above  Additional Descriptions for Materials In the Above	. Transporter 1 Company Name	· ,,,,, 6. L			C. Stat	e Transporter's	ID . [2]	
The Colors of Materials Listed Above  Additional Descriptions for Materials Signature  Additional Descriptions for Materials Signature  Above Descriptions for Materia	AND OF BELLEVIEW STORES 🛶 👵	Tel (AVE-30) - dige:	. Viiles.a.e.	y sa Hillaria.	F. Tran	sporter's Phone		Bellerader i de Residentia
No.   Type   County	4343 Kennedy	e and malphy edes o	•	n sławy s. <b>i 6 9. 4</b>	H. Faci	ity's Phone	51   51	en en en en en
Additional Descriptions for Materials Listed Above  Additional Descrip	1. US DOT Description (Including Proper Ship)	oing Name, Hazard Class,	end ID Number)			Total	Unit	Waste No
Additional Descriptions for Materials Listed Above  R. Handling Instructions and Additional information  Basergency Contacts  Ron Clouse 319–385–9061  Secription of Property Contacts  Ron Clouse 319–385–9061  Secription of Property Contacts  Printed Typed Name  Additional Descriptions for Materials  Ron Clouse 319–385–9061  Respective for Materials and Additional information  Respective for Instructions and Additional Information  Respective		quid, UNI210	Santagona's TB	14. D	M			D001
Additional Descriptions for Materials Listed Above  8. Handling Codes for Wastes Listed Above  8. Handling Codes for Wastes Listed Above  8. Special Handling Instructions and Additional Information  8. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  9. If a majer quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.  9. Printed/Typed Name  8. Signature  9. Signature  9. Date  9. Month Day  10. Date  10. Date  10. Month Day  10. Date  10. Date  10. Month Day  10. Date  10. Month Day  10. Date  10				1	es of this	tre v 1.5 viki Grija () to kr	11.	9 - 23 - 24 - 23 - 24 - 23 - 24
Additional Descriptions for Materials Listed Above  ALCE ALCE ALCE ALCE ALCE ALCE ALCE ALCE		and therein because)		机磁度性点				
Additional Descriptions for Materials Listed Above  ADDITION  Special Handling Instructions and Additional Information  Emergency Contacts Ron Clouse 319–385–9061  Signature  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Wastes Listed Above  For Listed Above  F. Handling Codes for Materials  F. Handling Codes for		s (1964), t enert cortité. Incom the englastrate sect	M Kantong kon steps				1 y.	
GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.  Printed/Typed Name  Signature  Month  Date  Month  Date  Month  Date  Month  Date  Month  Date  Day  Date								
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition to transport by inginery according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.  Printed/Typed Name  Signature  Month Date Day  Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  Signature  Month Date Day  Date Day  Date Day  Date Day  Discrepancy Indication Space	Additional Descriptions for Materials Listed Abo	ve Amaiom vi geni		11/16/201 1987 9 10 7 1	and sign			
determined to be economically practicable and that I have selected the practicable method of treatment, storage, of disposal currierly available which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.  Printed/Typed Name  Printed/Typed Name  Signature  Month Date Day  Date Month Date Day  Date Month Date Day Date Month Date Day Date Date Day Date Date Day Date Day Date Date Day Date Date Day Date Date Date Date Date Date Date Date	5. Special Handling Instructions and Additional In	formation  Ron Clouse 3	, 4000 (1000 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0 100 0		and sign			
Printed/Typed Name  Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  Signature  Month Date Month Date Printed/Typed Name  Signature  Month Date Day  Date Month Day  Date	5. Special Handling Instructions and Additional In  Finergency Contacts  GENERATOR'S CERTIFICATION: I hereby de- proper shipping name and are classified, p according to applicable international and n	formation  Ron Clouse 3  eclare that the contents content	of this consignment ar led, and are in all resplations.	e fully and acects in proper	curately condition	lescribed about for transport	ve by t by highv	vay
Printed/Typed Name  Printed/Typed Name  Signature  Signature  Month Date Month Date Day  Date Month Date Day  Date D	5. Special Handling Instructions and Additional In  Finergancy Contacts  5. GENERATOR'S CERTIFICATION: I hereby de- proper shipping name and are classified, p according to applicable international and n  If I am a large quantity generator, I certify determined to be economically practicable	formation  Ron Clouse 3  eclare that the contents cacked, marked, and label attional government reguly that I have a program e and that I have selected the best waste means and select the best waste means and select the	of this consignment are led, and are in all respectations.  In place to reduce the different practicable method the environment; Chanagement method the service of the serv	e fully and accepts in proper e volume and hod of treatn	curately condition	lescribed about for transport	ve by t by highv erated to al curren r, I have	vay  the degree I he tily available to made a good fa
Printed/Typed Name  Signature  Month Date Day  Date Day  One of the control of th	GENERATOR'S CERTIFICATION: I hereby de proper shipping name and are classified, p according to applicable international and n If I am a large quantity generator, I certify determined to be economically practicable which minimizes the present and future the effort to minimize my waste generation and Printed/Typed Name	formation  Ron Clouse 3  eclare that the contents contents of the contents of	of this consignment ar led, and are in all resplations. in place to reduce the difference the environment; Chanagement method to Signature	e fully and accepts in proper e volume and hod of treatn	curately condition	lescribed about for transport	ve by t by highv erated to al curren r, I have afford.	the degree I hatty available to made a good for the large Month Date
9. Discrepancy Indication Space The Control of the Space	5. Special Handling Instructions and Additional In Fine Year Contacts  5. GENERATOR'S CERTIFICATION: I hereby deproper shipping name and are classified, paccording to applicable international and note that is a large quantity generator, I certify determined to be economically practicable which minimizes the present and future the effort to minimize my waste generation and Printed/Typed Name  7. Transporter 1 Acknowledgement of Receipt of Printed/Typed Name	formation  Ron Clouse 3  eclare that the contents contents contents acked, marked, and labellational government regular to the selection of the contents of th	of this consignment ar led, and are in all resplations. in place to reduce the different the environment; Chanagement method to Signature  Possella	e fully and accepts in proper e volume and hod of treatn	curately condition	lescribed about for transport	ve by t by highverated to al curren r, I have afford.	the degree I hatty available to made a good fa
Antonio de la composició de la composició La composició de la compo La composició de la compo	GENERATOR'S CERTIFICATION: I hereby de proper shipping name and are classified, p according to applicable international and not a large quantity generator, I certify determined to be economically practicable which minimizes the present and future the effort to minimize my waste generation and Printed/Typed Name  Transporter 1 Acknowledgement of Receipt of Printed/Typed Name  Transporter 2 Acknowledgement of Receipt of Printed/Typed Name	formation  Ron Clouse 3  eclare that the contents of acked, marked, and label actional government regulational government regulational government and that I have selected to human health and select the best wastern of Materials	of this consignment ar led, and are in all resplations. in place to reduce the dathe environment; changement method the Signature  Signature  Signature  Signature	e fully and accepts in proper e volume and hod of treatm DR, if I am a shat is available	curately condition to take to me a	lescribed about for transport	ve by the highway by highway afford.	the degree I h tity available to made a good for flooth Date flooth Date flooth Date flooth Date flooth Date
D. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.	GENERATOR'S CERTIFICATION: I hereby deproper shipping name and are classified, paccording to applicable international and office the proper shipping name and are classified, paccording to applicable international and office the shipping name and are classified, paccording to applicable international and office the shipping name and are classified, paccording to applicable international and office the shipping name and are classified, paccording to applicable which minimizes the present and future the effort to minimize my waste generation and Printed/Typed Name  7. Transporter 1 Acknowledgement of Receipt of Printed/Typed Name  9. Discrepancy Indication Space	formation  Ron Clouse 3  eclare that the contents contents of the contents of	of this consignment ar led, and are in all resplations.  In place to reduce the difference of the environment; Contamend the environment; Contamend the contament method the cont	e fully and accepts in proper e volume and hold of treatmore, if I am a shat is available.	curately condition toxicity nent, stora mall quar e to me a	described abort for transport of waste generate of dispositify generato and that I can a	ve by the highway by highway afford.	the degree I hitly available to made a good farmade Date Pay 1.5 (Annth Date Date Date Date Date Date Date Date

to the the whole we have the

who are the strong the property of the strong of the stron

regularitation.

## Noting of Violation Pursuant to Requiments of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Ma-a.	14- Lows Lovers
	617 HARVEY RO HAYES LOOKSTRIAL PART
EPA ID Number: ZADO	9878/5/7 Date: 8-7-9/
During an inspection just c	ompleted to determine compliance with the requirements of lations promulgated pursuant thereto, the following
Citation	Description of Violation
40CFR 262.11	FAILURE TO MAKE A MARAPOUND WASTE DOTTE ON A
	WITH SOLVEST SPENT FILTER MEDIA FROM
	LITHO FOUNTAIN SOLUTION & USOD OIL FILTERS
4D CFR 2/234(a)(3)	WASTE INK DEUMS NOT DATED
YOCFR 22234(9) (4)	WASTE IN A DRUMS WAT LABSLED
40 CFR 265,173 (9)	WASTE INH DRUM DOT CLOSED
40CER26516(d)	EAULUE TO HAYE A MARROUS WASTE
toe	mandown on Tilles land
40CFR 245.34	FALLIKE TO HAYE COMMUNICATION OR ALARM
	EALLETTO HAVE A ENCILLE CONTINSONCY.
40CFR 265.51	FOR HAZAR DAUS WASTED MANAGEMENT.
	FOR HAZAR SOUS WASTE TO AUGUST WE WILL TO SEE
The Market lows Envosor days of receipt of this not schedule for completion of Chief. RCRA Branch. U. S. E	sued pursuant to Section 3008 of RCRA and may not be a lations which may be identified as a result of this inspection is hereby requested to submit in writing within 10 ice a description of all corrective actions taken and/or a necessary correction actions to be taken to the later savores nvironmental Protection Agency, Region VII, 726 Minnesota
Ave., Kansas City, Kansas,	66101. The corrective actions taken by Marsh - Jour Envoye
will be considered in subse assessed, corrective action	quent enforcement follow-up. Should civil penalties be (s) will be considered in assessing the penalty amount.
If you have any questions of the Moreone (1) at (5)	n this Notice or wish to discuss your response, you may call (U. S. EPA) at (98)551-7880, or 400 20072
	TARY WITKONSKI Date: 8-7-91
	그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그
The undersigned person here Notice and has read same.	by acknowledges that he/she has received a copy of this
Pr	inted Name: ROMAND J. CADUSE Date: 8/7/91
	gnature: Ronal & Cloud
	itle: Plant mgv.









## Mackay Envelope Corporation

lowa Division

Mr. Michael Sanderson Chief, RCRA Branch U. S. E. P. A., Region VII 726 Minnesota Avenue Kansas City, Kansas 66101